

Our ref: HC6844A

Camden Council
5 Pancras Square
London
N1C 4AG

10th January 2022

Dear Sirs,

Nos. 10-11 and 53-54 Doughty Street, London, WC1N 2LS

I am writing on behalf of Doughty Street Chambers in relation to an application for Planning Permission and Listed Building Consent for the installation of photovoltaic (solar) panels at Nos. 10-11 and 53-54 Doughty Street, London, WC1N 2LS.

Following initial consultation in June 2019 Camden Council specifically requested a '*Heritage Assessment of the existing roof informing the significance of the roof and the impact of the proposals on the roof form and historic fabric*', which is provided below.

Heritage Assets: Assessment of Significance

The application site comprises Nos. 10 – 11 and Nos. 53-54 Doughty Street, both of which form part of Grade II Listed terraces, and are located within the Bloomsbury Conservation Area.

The Bloomsbury Conservation Area is a large area which is characterised by fourteen sub-areas. The application site falls within sub area 10, which is described in detail within the adopted conservation area appraisal (2011) and discussed further below. The Conservation Area was designated in 1968 and encompasses large areas of commercial, institutional, cultural and residential uses and is known for its significant town planning. The buildings largely date from the late 17th to the 19th century with later 20th century expansion and change of use particularly evident in houses being converted to hotels. While the area was originally designated as an example of Georgian town planning the area has been extended to include Victorian, Edwardian and 20th century buildings reflecting the development of the area over time.

Sub area 10, and specifically Doughty Street, comprise principally of almost complete Georgian terraces which are themselves listed buildings. The Conservation Area Appraisal notes the special significance of these townhouses as follows:

"The townhouses along John Street, Doughty Street and Guilford Street are of significance as they are almost complete Georgian streets, lined with terraces. John Street dates from the mid 18th century, whilst Doughty Street and Guilford Street span the late 18th century to the early 19th century. Although later in date, the townhouses are similar in plan form to those in Bedford Row, but are of a smaller scale and footprint. They are constructed from yellow stock brick, the earlier examples with red brick trim and the later examples with stucco detail. Various designs of doorcases, fanlights and balconies are evident. Doughty Street comprises a mixture of four-storey terraces with basements and three-storey terraces with basements and mansard roofs. All the buildings within the street are grade II listed, with the exception of Dickens' House Museum at No 48, which although architecturally almost identical is listed grade I for historical reasons." (2011, 77).

Nos. 53-54 Doughty Street form part of a Grade II listed terrace of substantial sized townhouses which was completed by c.1820. The terrace occupies the eastern side of Doughty Street. As noted in the list description, the majority of these townhouses possess slate mansard roofs with dormers, except for Nos 53-55 and 62, where no dormers are present. These specific townhouses also differ from the majority along Doughty Street, being four-storeys with basements, rather than three. Nos. 53-54 also feature round-arched doorways with moulded jambs and lion-head stops, cornice-heads and patterned radial fanlights.

Nos. 10-11 also form part of a Grade II Listed terrace of townhouses, situated on the opposite (western) side of Doughty Street. Nos. 10-11 were amongst the earliest within the terrace to be completed, by c. 1800. Nos. 6-19 all have slate mansard roofs with dormers, are three storeys in height, and possess attics and basements. As attested within the terrace on the eastern side of the street, they have round-arched doorways with panelled or recessed pilaster-jambs (exceptions being Nos 9, 14 & 15 with attached columns), cornice-heads, patterned fanlights, and panelled doors.

The significance of these assets stems principally from their architectural merit and historic interest, which shows some variety in detailing throughout the terraces but remains visually consistent as a streetscape. The significance of the buildings is also derived from the archaeological value of their retained historic fabric, and it is apparent that for the most part and externally, the terraces have retained much of their original features and form. Their visual coherence as a group contributes positively to the character and appearance of the Conservation Area.

Impact Assessment

The proposals seek to discreetly and sensitively retrofit Nos. 10-11 and Nos. 53-54 Doughty Street with photovoltaic (solar) panels, with a view to reducing the carbon emissions associated with the day to day running of the buildings as offices.

The client is acutely aware of the wider climate emergency as well as Camden's commitment to becoming a zero carbon borough by 2030. At the same time, respecting the listed status of the properties and mitigating any impact on the wider Conservation Area has been viewed as critical in the development of the proposals.

The photovoltaic panels are proposed in locations where they will not be visible from adjacent public spaces, and visual studies have been conducted (and are submitted as

part of the application) in order to ensure that the positioning of the panels will not alter the appreciable character and appearance of the buildings themselves, or of the Conservation Area more broadly.

The panels have been specifically placed out of general view, or on the secondary rear elevations, and the number of panels has been maximised to ensure that the optimal output is achieved. Reversibility has also been considered to ensure that all fixing types can be removed or upgraded at a later date, with little to no physical intrusion and no consequential impact on the historic fabric of the buildings. Any visibility of the panels would be restricted to views from the secondary floors of nearby properties, but would not fall within any designed views, and where glimpses of the panels are possible this would not affect the architectural or historic interest of the assets.

Having considered the potential impact of the proposals, it is evident that while the rooftops of the buildings do form one aspect of their architectural interest, and therefore contribute to the significance of the buildings as designated heritage assets overall, the installation of the panels will not alter the way these assets can be and are currently appreciated and viewed, and because of the considered installation methods, will not pose any undue impact to their historic fabric. No harm has been identified to the significance of the listed buildings. Similarly, the installations will not be readily visible within the broader Conservation Area, or within the settings of adjacent listed buildings, and are not considered to pose any harm to its character and appearance, or to its significance.

Overall, the addition of green energy sources should be especially welcome alongside visual evidence of them being incorporated sensitively into listed buildings, ensuring the buildings future sustainability and contributing to the environmental aims of the borough.

Kind regards,

A handwritten signature in black ink, appearing to read 'Paula Jones'.

Dr Paula Jones
Heritage Consultant (Associate Director)
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